

REMARKS

Reconsideration of the present application, as amended herein, is respectfully requested.

The Specification has been objected to as failing to provide proper antecedent basis for the claimed “locking finger.” Claims 12, 14, 19 and 20 have been amended to recite a “follower finger” in place of the previously recited term “locking finger”. Claims 12, 13, 14 19 and 20 have been further amended to help distinguish the newly recited “follower finger” from a “cam follower finger”, now recited. These terms are amply supported by the specification. See, for example, page 5, lines 9 – 14 and page 5, lines 17 – 19.

Claims 4, 7, 8, 12 and 17 are objected to for various informalities pointed out in the Office Action. Those claims have been amended to address the informalities in the manner suggested on page 2 of the Office Action.

Claims 1 – 20 currently stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,343,185 to Aoshima et al., (the “Aoshima ‘185 patent). Claims 1 and 15 have been amended to more clearly set forth a temporal relationship to one aspect of the claims.

Applicant respectfully traverses the above rejections, as they relate to the amended claims.

**I. The Aoshima Reference neither teaches nor suggests Claims 1 – 14 of the present patent application**

Claim 1 of the present patent application recites a method for setting a counter wheel in a camera. Among other steps, the method comprises the step of, first, locking the sprocket wheel with a locking member (step b); and, second, rotating the counter wheel in a first direction until a complementary portion on the counter wheel locks with a mating portion on the sprocket assembly to prevent further rotation of the counter wheel in the first direction (step e). Claim 1 has been amended herein to clarify that the rotating step (e) occurs after the locking step (b). As such, the sprocket assembly is locked when the counter wheel is set (i.e. the complementary portion is locked with the mating portion).

The invention of claim 1 of the present application is very different from what is taught in the Aoshima ‘185 patent. In the Office Action, a “sector shaped lock portion 165” is pointed to as the “complementary portion” of claim 1, whereas a “projection 153g” is pointed to in the

Office Action as the claimed “mating portion”. However, neither the lock portion 165 nor the projection 153g, function as the mating portion or complementary portion of claim 1, for the following reasons, among others.

**1. The sprocket assembly is not locked, as required by claim 1, when the “sector shaped lock portion 165” engages the “projection 153g”.**

The sprocket assembly is not locked, as required by claim 1, when the “sector shaped lock portion 165” engages the “projection 153g”. Referring to Figs. 25 and 30 of the Aoshima ‘185 patent, were the sprocket locked when the projection 153g engaged the lock portion 165, the “one frame advancing arm 153d” would be engaged with the cam notch 155f. See Col. 19, lines 30 – 34:

**“The one-frame advancing cam 155b has a cam notch 155f formed therein. When the retainer lever 153 is in the retention position, the end of the one-frame advancing arm 153d is engaged with the cam notch 155f to block rotation of the cam member 155 and the sprocket wheel 161.”**

As shown in Figs. 25 and 30, the sprocket wheel is not locked in this manner when the projection 153g engages the lock portion 165.

In the Aoshima ‘185 patent, the sprocket wheel is not locked by the locking member, as required by claim 1, prior to the setting of the counter wheel. Rather, it is the projection 153g contacting the lock portion 165 of Aoshima, that locks the sprocket wheel of the Aoshima ‘185 patent, after all exposures have been taken.. See Col. 21, lines 57 – 65.

**“Upon the winding operation of the photo film 124 after exposing a final frame, the sector-shaped lock portion 165 comes in contact with the projection 153g of the retainer lever 153 which is not in a state of charging the shutter. See FIG. 25. This avoids rotation of the counter disk 152, the cam member 155 and the sprocket wheel 161, and hinders charging of the shutter. No exposure is taken in the exposure-inhibit regions of the photo film even when shock or vibration occurs.”**

Thus, to lock the sprocket wheel with the “locking member” of claim 1, prior to contacting the projection 153g with the lock portion 165 of the Aoshima ‘185 patent not only destroys the teachings of the Aoshima ‘185 patent, but would most likely not even be physically possible with the device taught in the Aoshima ‘185 patent. That the projection 153g and lock portion 165 of

Aoshima are not the complementary portion and mating portion of claim 1 is further supported in the Aoshima '185 patent in Col. 30, lines 31 – 37.

**“When the counter disk 152 is in the finish position, a lateral face of the sector shaped lock portion 165 on the bottom of the counter disk 152 is contacted by the projection 153g of the retainer lever 153. The counter disk 152, the cam member 155 and the sprocket wheel 161 are kept from rotating.”**

As can be seen, the Aoshima patent fails to teach or suggest the method of locking the sprocket wheel prior to setting the counter wheel by locking a complementary portion with an mating portion of claim 1 of the present application. To do so would destroy the teachings of the Aoshima '185 patent. As a result, it is believed that claim 1 and its dependent claims are patentable over the Aoshima '185 patent.

**2. The sector shaped lock portion 165 of the Aoshima '185 patent is not used to set the counter, as required by Claim 1.**

Further, in the Aoshima '185 patent, it is not taught or suggested that engaging the sector shaped lock portion 165 with the projection 153g can be used to set the counter, as required by claim 1 of the present application. Rather, referring to Col. 21, lines 52 – 65, it is specifically set forth that the projection 153g and the lock portion 165 are engaged after exposing a final frame to prevent the camera shutter from being charged to take more picture. See also Col. 30, lines 31 – 37. Later in Col. 21 of the Aoshima '185 patent, while referring to Fig. 13A, the process of setting the counter is described in line 66 – Col. 22, line 15, as a process of aligning detection indicia 151b with a slot 167 c of the upper plate. There is no teaching or suggestion in the Aoshima '185 patent that this “initial position” of the counter described in connection with Fig. 13a is in any way related to the engagement of the projection 153g with the lock portion 165 of Figs. 25 and 30.

As can be seen, the Aoshima patent fails to teach or suggest the method of setting the counter of claim 1 of the present application, and as a result, that claim and its dependent claims are all believed to be patentable over the Aoshima '185 patent.

**3. The Aoshima '185 patent neither teaches nor suggests features of the claims dependent from claim 1, such as a second "ramped" cam.**

Applicant also respectfully traverses that certain features in the dependent claims are taught or suggested by the Aoshima '185 patent. For example, claims 13 and 14 require a particularly set forth second, ramped cam including a groove. The Aoshima '185 patent does not teach the use of such a cam. The Office Action suggests that the charge cam protection portion 155c and bias cam 155d of the Aoshima '185 patent represent the claimed second cam. However, neither of the cited portions 155c or 155d of the Aoshima patent have the claimed geometric relationship to the sprocket, the claimed groove, or the claimed interaction between the cam follower finger and the groove located in the ramp, as recited in the claim. As such, it is believed that these claims are further patentable over the Aoshima '185 patent.

**II. The Aoshima Reference neither teaches nor suggests Claims 15 – 20 of the present patent application**

Claim 15 has been amended to more clearly set forth that the complementary portion initially mates with said mating portion at a time when said locking member is locked. As described above, the Aoshima '185 patent does not teach or suggest the claimed mating occurs when the locking member has locked the sprocket wheel. Rather, the Aoshima '185 patent teaches that the lock portion 165 engages the projection 153g as a second way to lock the sprocket wheel once the final exposure has been made. The arguments from section I1, above is incorporated herein as it pertains to camera claim 15 and its dependent claims 16 - 20.

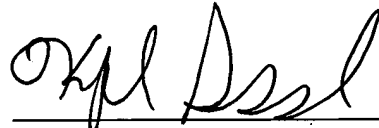
Likewise, the arguments of section I2., additionally are incorporated herein as pertaining to camera claim 15. As described above, the mating relationship of the lock portion 165 and the projection 153g of the Aoshima '185 patent are not taught as being used to initially set the counter. Rather, as described above and in col. 21, line 66 – col. 22, line 15, visible indicia is used to set the counter.

Additionally, the arguments set forth above pertaining to the second ramped cam is incorporated herein as applying equally to claim 20.

In view of the foregoing, it is believed that all claims are presently in condition for immediate allowance, and such action is respectfully requested.

Respectfully submitted,

Date: March 29, 2004

A handwritten signature in black ink, appearing to read "Kerry Sisselman", written over a horizontal line.

Kerry Sisselman

Reg. No. 37,237

Concord Camera Corp.

4000 Hollywood Blvd., Suite 650N

Hollywood, FL 33021

Telephone No.: (954) 331-4247

Facsimile No.: (954) 989-4103